

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
FEB 14 2013  
DAVID J. MALAND, CLERK  
BY  
DEPUTY \_\_\_\_\_

UNITED STATES OF AMERICA

§  
§  
§  
§  
§

v.

NO: 4:12CR155

Judge Schell

ANSON CHI

**SUPERSEDING INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 26 U.S.C. §§ 5841, 5845,  
5861(d), and 5871  
(Possession of a firearm not registered in  
the National Firearms Registration and  
Transfer Record)

On or about June 18, 2012, in the Eastern District of Texas, **Anson Chi**, defendant,  
did knowingly possess a firearm, to wit: a destructive device manufactured through the  
use of chemicals and a combination of parts intended for use in converting a readily  
assembled explosive, which was not registered to him in the National Firearms  
Registration and Transfer Record.

In violation of 26 U.S.C. §§ 5841, 5845, 5861(d), and 5871.

### **Count Two**

Violation: 18 U.S.C. § 844(i)  
(Explosive Materials - Malicious Use)

On or about June 18, 2012, in the Eastern District of Texas, **Anson Chi**, defendant, did maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, personal property, namely, an Atmos natural gas pipeline, used in interstate or foreign commerce and used in an activity affecting interstate and foreign commerce.

In violation of 18 U.S.C. § 844(i).

### **Count Three**

Violation: 18 U.S.C. § 924(c)(1)(B)(ii)  
(Use or Carrying a Destructive Device  
During a Crime of Violence)

On or about June 18, 2012, in the Eastern District of Texas, the defendant, Anson Chi, did knowingly carry and use a destructive device, to wit, an improvised explosive device, during, in relation to, and in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, the malicious use of fire and explosives to damage and destroy an Atmos natural gas pipeline in violation of 18 U.S.C. § 844(i) as charged in Count Two of this Superseding Indictment.

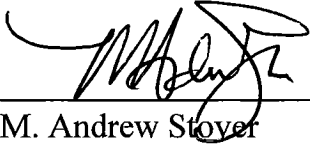
All in violation of 18 U.S.C. § 924(c)(1)(B)(ii).

A TRUE BILL,

*BB*

FOREMAN OF THE GRAND JURY

JOHN M. BALES  
UNITED STATES ATTORNEY



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**Notice of Penalty**

**Count One**

Violation: 26 U.S.C. § 5861(d)

Penalty: A term of imprisonment of not more than ten years, a fine not to exceed \$250,000, or both, and a term of supervised release not to exceed three years.

Special Assessment: \$100.00

**Count Two**

Violation: 18 U.S.C. § 844(i)

Penalty: A term of imprisonment of not more than twenty years, a fine not to exceed \$250,000, or both, and a term of supervised release not to exceed three years.

Special Assessment: \$100.00

**Count Three**

Violation: 18 U.S.C. § 924(c)(1)(B)(ii)

Penalty: A term of imprisonment of not less than thirty years, a fine not to exceed \$250,000, or both, and a term of supervised release not to exceed five years.

Special Assessment: \$100.00